V. BELLSOUTH HAS NOT ESTABLISHED THAT IT HAS ADEQUATE CAPACITY TO MEET CLEC REQUIREMENTS.

283. In addition to failing to show that it has made available nondiscriminatory, operationally ready interfaces for all OSS functions for all resale services and unbundled network elements, BellSouth has failed to show that the OSS interfaces and other access procedures which it proposed will have adequate capacity to handle the volume of CLEC orders and other service requests that can reasonably be expected to occur as local markets become competitive. Aside from offering unsubstantiated and arbitrary capacity figures for some of its interfaces, BellSouth's discussion of the capacity issue amounts to an assertion that BellSouth can be trusted to meet the requirements of the CLECs. That is insufficient. Indeed, the reliability of BellSouth's claims is belied by its own data.

284. Mr. Stacy attempts to show that BellSouth has sufficient capacity by describing BellSouth's "testing" and then asserting that the capacity he describes far exceeds actual or forecasted volumes. Stacy OSS Aff., ¶¶ 191-219. The Commission, however, has stated that the best evidence of a BOC's capacity is actual commercial usage -- not testing, which is a far less reliable indicator. Ameritech Michigan Order, ¶ 138. Even the "actual usage" data described by Mr. Stacy does not prove his point, because the small volumes of orders placed by CLECs are the result not of choice, but rather of BellSouth's refusal to open its markets to competition. AT&T, for example, intends to send several thousand orders per day through the BellSouth interfaces once those markets are open. the small volumes of orders that it has submitted to BellSouth are due to BellSouth's refusal to comply with its obligations under the

1996 Act, thereby impeding AT&T's market entry. To find adequate capacity in these circumstances would be tantamount to rewarding BellSouth for its own misconduct.

285. Adequate load carrying capacity is an essential component of establishing the operational readiness of BellSouth's proposed interfaces and related OSS access procedures. An interface or service order processing procedure that operates satisfactorily at low volumes but "chokes" the processing flow for CLEC service orders at actual market volumes will place BellSouth's competitors and their customers at a severe disadvantage.

286. The Commission recognized in the Ameritech Michigan Order that the ability of a BOC to have sufficient capacity, and to handle an increasing volume of orders, "will be a critical component in order for competition to develop in the . . . local exchange market." Ameritech Michigan Order, ¶ 191. Thus, a BOC must show that its systems are designed to accommodate both current and projected demand, are actually handling current demand, and will be able to handle reasonably forecasted demand, both for resale and for UNEs, at an acceptable level of quality. Id., ¶¶ 110, 137-138, 161, 191, 199.

287. Thus, BellSouth cannot demonstrate that it has adequate capacity simply by asserting that its interfaces have operated satisfactorily at volumes currently or previously submitted by the CLECs. As my testimony and the affidavits of AT&T's other witnesses demonstrate, BellSouth has delayed CLECs, including AT&T, from entering the local exchange market by refusing to comply with its obligations under the 1996 Act (including the obligation to provide nondiscriminatory access to its OSS). The fact that BellSouth may be able to process the relatively small handful of orders and transactions that CLECs have managed to submit despite

BellSouth's refusal to open its markets is therefore no indication of its ability to handle the vastly greater volumes that can reasonably be expected in the future, if and when the market is in fact open to competition.[119]

288. In addition, adequate capacity cannot be demonstrated merely by showing that an interface has the capacity to handle an aggregate total of orders or transactions. The interface must also have the capability of processing orders simultaneously from all of the CLECs, up to that aggregate capacity, promptly and efficiently. For example, even if BellSouth's resale ordering interfaces have a combined capacity of 14,500 orders per day from a single CLEC, the interfaces nonetheless lack adequate capacity if they cannot handle thousands of orders from a number of CLECs at the same time.

289. Adequate capacity also cannot be established by a BOC's mere reassurances, such as those offered by BellSouth here, that the BOC can process high volumes and unforeseen "spikes" in demand. See Application, p. 28; Stacy OSS Aff., ¶¶ 192, 195-196. Particularly where, as in BellSouth's case, a BOC engages in substantial manual processing of orders, the BOC should be required to demonstrate that its systems can electronically process high volumes and unpredictable surges of orders from CLECs as efficiently and accurately as the BOC processes its own orders.

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[119] For example, although AT&T has submitted no more than 3,000 orders per week to BellSouth in recent months, AT&T expects that it will be submitting several thousand orders per day to BellSouth when it is able to enter the local exchange market throughout the BellSouth region.

290. Past experience demonstrates that BOC reassurances of adequate capability to handle both demand and demand "spikes," without ample supporting proof, are unreliable. For example, in the Ameritech region, Ameritech was unable to process electronically all of the orders received from AT&T when AT&T substantially increased its order volumes, even though the total number of orders was still well below the range of Ameritech's stated capacity. Ameritech Michigan Order, ¶¶ 189-199. When AT&T and other CLECs attempted rapid resale-based entry in California, Pacific Bell's systems could not handle the increase in order volume and volatility -- even though Pacific Bell had stated that it had ample capacity to process such volumes. The backlog became so great that AT&T and MCI were forced to suspend their marketing efforts. Finally, despite BellSouth's assurances of adequate capacity, AT&T lost all or most of its access to BellSouth's RSAG system when AT&T substantially increased its order volumes last year; yet, as in the case of Ameritech and Pacific Bell, the volumes submitted by AT&T were far below the stated capacity.[120] Noting the evidence of the RSAG problem, the Commission properly expressed concern as to whether BellSouth had the capacity to handle greater volumes as more CLECs entered the market. BellSouth South Carolina Order, ¶ 181.

291. The painful lesson of these experiences is that neither AT&T nor any other CLEC can afford to take the reputational risks based on mere reassurances of a BOC that it has adequate capacity, especially where the BOC's ordering and provisioning processes involve a substantial degree of manual processing and the BOC is processing relatively small volumes of

[120] See Affidavit of Jay M. Bradbury filed in CC Docket No. 97-231, ¶¶ 284-296.

orders. Reassurances are no substitute for actual proof of adequate capacity, including evidence of actual usage in a truly open market.

292. Finally, adequate capacity cannot be demonstrated by internal testing. BellSouth must demonstrate on the basis of actual commercial usage and robust inter-carrier testing that its systems will process orders at the claimed capacity levels simultaneously for the number of CLECs expected to submit orders and transactions.

293. Capacity should be evaluated by analogy to the long-distance market, where (as described in the affidavit of Drs. Hubbard and Lehr) currently more than 50 million customers nationwide change carriers every year. Similar turnover can be expected in local services markets if and when the incumbents open those markets. In evaluating BellSouth's applications for Section 271 authority for South Carolina and Louisiana, the Department of Justice relied on this fact in concluding that BellSouth's systems lack adequate capacity. Citing the nearly 23 million access lines in the BellSouth region and using the primary interexchange carrier ("PIC") change measure that this Commission described in the Ameritech Michigan Order, the Department estimated that there are about 17,000 PIC changes per business day in BellSouth's region. Based on consumer surveys predicting that 20 percent of consumers would change (and an additional 17 percent of customers would consider changing) local carriers, the Department found that "one could estimate from this an average of roughly 18,000 to 33,600 lines per business day changing region-wide."[121] Moreover the Department noted that in a competitive

[121] See, e.g., Evaluation of the Department of Justice Submitted November 4, 1997, in CC (continued...)

environment, "BellSouth will experience far greater order volumes" than the 4,000 additional lines per business day that it was experiencing.[122] For these reasons, the Department concluded that "BellSouth's systems presently have limited capacity and have not been proven effective for handling large, competitively significant volumes of demand."[123]

294. Under this analysis, BellSouth's claimed capacity of 14,500 orders per day is woefully insufficient to meet CLEC demand. See Stacy OSS Aff., ¶¶ 192, 201, 211. This capacity falls far short of the 18,000 to 33,600 line figure used by the Department of Justice. The actual shortfall is probably much greater, since the DOJ analysis was exceedingly conservative, having been based on a projection of 30 million PIC changes per year, not on the current annual figure of more than 50 million PIC changes.[124]

295. Moreover, BellSouth's own data demonstrate the total arbitrariness of its claim of sufficient capacity. BellSouth's claimed ordering capacity of 14,500 orders per day represents an unexplained increase of almost 50 percent from the capacity of 10,000 orders alleged by Mr. Stacy in BellSouth's Louisiana application -- which, in turn, had arbitrarily doubled

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[121] (...continued)
Docket No. 97-208 ("DOJ South Carolina Evaluation"), pp. A-29 - A-30 (citing Ameritech Michigan Order, ¶ 191 n.494).

[122] Id., pp. A-29 - A-30.

[123] Id., p. A-27.

[124] See id., p. A-29 n.46.

the claimed capacity.[125] BellSouth does not claim that it has taken any action to increase its capacity since it filed its first Louisiana application only nine months ago; in fact, it offers no explanation as to how, or why, its capacity changed so dramatically

296. Even more important, however, is the total inconsistency between BellSouth's current claims regarding the claimed respective capacities of LENS and EDI with its assertions of the past. Although BellSouth altered its capacity figures after the filing of its South Carolina application, on one point BellSouth has always been consistent: it described the capacity of EDI as being four times that of LENS, which BellSouth described as a limited interface intended primarily for ordering by small CLECs. Thus, when Mr. Stacy filed his affidavit in the Louisiana proceeding last November, he stated that EDI had a capacity of 8,000 orders per day, and LENS had a capacity of 2,000 orders per day. Stacy La. OSS Aff., Exh. WNS-43 (Attachment 48 hereto).

297. Mr. Stacy's current affidavit, however, tells an entirely different story. He now portrays the capacities of EDI and LENS as equal, each having a capacity of 7,250 orders per day. Stacy OSS Aff., Exh. WNS-38. To accept this data as accurate, one would have to believe that the capacity of EDI has decreased within the last nine months by 750 orders per day,

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[125] When BellSouth filed its Section 271 application for South Carolina in September 1997, Mr. Stacy contended that the combined ordering capacity of its OSS was 5,000 orders per day. See Affidavit of William Stacy on Operations Support Systems filed September 30, 1997 in CC Docket No. 97-208 ("Stacy S.C. Aff."), ¶ 119 & Exh. WNS-43. Only five weeks later, after AT&T pointed out a number of flaws in his analysis, Mr. Stacy filed an affidavit that inflated the capacity figures to 10,000 orders per day simply by changing his assumption of a 10-hour production day to a 20-hour production day without explaining or defining that change. See Stacy La. OSS Aff., ¶ 120 & Exh. WNS-43.

while the capacity of LENS has increased almost threefold. Mr. Stacy does not explain this change, nor can he. His capacity data are plainly inconsistent, arbitrary, and unreliable.

298. Even leaving aside the inherent unreliability of Mr. Stacy's ordering capacity data, BellSouth has not shown that it has sufficient capacity with respect to any of its interfaces.

A. LEO, LESOG, and SOCS

299. The editing and formatting systems on BellSouth's side of the OSS -- LEO, LESOG, and SOCS -- obviously must have sufficient capacity if CLEC transactions are to flow smoothly through the system. If they lack such capacity, they will act as a bottleneck, impeding CLEC access.

300. Mr. Stacy, however, has provided no information regarding the capacity of SOCS -- which is a system that processes both BellSouth orders and CLEC orders. Stacy OSS Aff., ¶¶ 77-80, 119 & Exh. WNS-1. Even the conservative capacity figures computed by the Department of Justice (¶¶ 293-294, supra), SOCs would have to be able to handle an average of at least 22,000 to 37,600 orders per business day -- 18,000 to 33,000 lines changing region-wide plus 4,000 additional (new) lines.[126] BellSouth has submitted no evidence that SOCs can process this volume of orders, or that it can do so while being used simultaneously by BellSouth and the CLECs in the BellSouth region.

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[126] This figure does not include those orders from BellSouth's 23 million existing customers to add new features to their existing service. These orders also would have to pass through SOCS.

301. Mr. Stacy's ordering capacity exhibit describes the capacity of LEO and LESOG as 14,500 orders per day each, and he states that "hot spare" arrangements are in place that could double the capacity. Id., ¶ 192 & Exh. WNS-38. Even leaving aside the inherent arbitrariness of the 14,500-order figure, that volume constitutes an average of little more than 1,600 orders per day for each of the nine states in the BellSouth region -- a patently insufficient number to support meaningful competition in a multi-CLEC market.

B. Pre-Ordering Interfaces

302. BellSouth's own data show that its pre-ordering interfaces lack sufficient capacity. Mr. Stacy asserts that LENS has daily capacity of 81,600 such transactions per day and that EC-Lite can process up to 6,900 transactions per day. Stacy OSS Aff., ¶¶ 192, 195. That combined capacity of 88,500 transactions per day, however, would be insufficient to handle the 35,325,000 pre-ordering transactions that BellSouth forecasts for 1999. Id., Exh. WNS-39, p. 8.

303. Moreover, although Mr. Stacy states that LENS "was designed to support multiple pre-ordering transactions for the expected daily combined volume of CLEC orders," BellSouth's own forecasts assume a total of 8.79 pre-ordering transactions per order. Id., ¶ 193 & Exh. WNS-39, p. 13 (assumption 18). If, as Mr. Putnam testified, BellSouth's systems have processed as many as 14,500 orders within a single day, the combined capacity of LENS and EC-Lite would be insufficient to handle the total pre-ordering transactions of 127,455 transactions per day (8.79 x 14,500) that would occur under BellSouth's own forecast. Id.; Putnam Aff., Exh. JWP-1, p. 14.

304. The capacity of EC-Lite also appears to be wholly inadequate to meet demand. Even if AT&T performs an average of only three pre-ordering transactions per order, EC-Lite's capacity would be exhausted once AT&T placed 2,300 orders. Yet AT&T has forecast far more orders than that to BellSouth.

305. BellSouth has also presented no evidence regarding the ability of LENS and EC-Lite to handle simultaneous users, other than Mr. Putnam's bald, vague assertion that "LENS supported 400 concurrent users" during a one-day test conducted on April 21. Putnam Aff., Exh. JWP-1, p. 14.[127] Neither he nor BellSouth provides any such data with respect to EC-Lite. Id. Given BellSouth's failure to provide any reliable data on this issue, CLECs cannot be certain that their respective pre-ordering transactions will be processed smoothly and efficiently when numerous other CLECs are also using the interfaces. BellSouth has also not demonstrated that LENS or EC-Lite can meet its pre-ordering capacity claims while simultaneously processing orders, at capacity or below.

[127] The reliability of Mr. Putnam's assertion is highly questionable, because he indicates that the 400 "concurrent users" performed a total of only 81,000 pre-order inquiry transactions simultaneously with the 17,000 orders that were submitted, resulting in an average of approximately 4.75 pre-ordering transactions for each order. Putnam Aff., Exh. JWP-1, p. 14. As I have previously stated, however, BellSouth's own forecasts assume an average of 8.79 pre-ordering transactions per order for actual commercial operations -- nearly twice the ratio used in the test, and a substantially greater load on BellSouth's system than the volumes performed during the test.

C. Ordering/Provisioning Interfaces

306. Mr. Stacy does not even describe the capacity of BellSouth's EXACT interface, which purportedly supports the ordering of certain UNEs.[128] BellSouth also has not shown that its two remaining ordering interfaces, EDI and LENS, have sufficient capacity to process the expected volumes of CLEC orders. As previously stated, BellSouth's current capacity figures are wholly inconsistent with its past representations. Even leaving that inconsistency aside, the average ordering capacity of each of the nine States in the BellSouth region would be only 1,600 orders a day -- a volume clearly inadequate to meet expected demand.

307. More fundamentally, Mr. Stacy's arbitrary 14,500-order capacity claim fails to take into account the reality that CLEC demand is not spread evenly throughout the 20-hour day that he assumes, but can fluctuate significantly during the day. Particularly as more CLECs enter the market, the order processing flow is likely to be unpredictable and fluctuating.[129] Although he contends that the BellSouth processors protect "against unforeseen demand surges," he give no specifics. Stacy OSS Aff., ¶ 192. If the BellSouth systems operate on a 20-hour day,

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[128] According to Mr. Stacy, capacity testing of the interfaces other than LENS and EDI "is not needed because they have been tested through actual operations at commercial volumes." Stacy OSS Aff., ¶ 200. However, the fact that an interface such as EXACT is currently used by BellSouth to process access requests from interexchange carriers does not mean that EXACT has sufficient capacity to handle orders from CLECs for UNEs. The number of local service customers of CLECs is likely to be many times greater than the number of interexchange carriers currently served by BellSouth.

[129] See Ameritech Michigan Order, ¶ 195 & n.502

the average maximum hourly capacity will be only 725 orders per hour -- and BellSouth will exceed its capacity whenever order volumes rise above that hourly level.

308. Mr. Stacy's assertion that BellSouth could "readily increase" its capacity within one week with "hot spare" arrangements to 29,000 orders per day is unpersuasive. Id. Mr. Stacy provides no evidence to support this position, and it is inconsistent with BellSouth's previous submissions to the Department of Justice last October, which estimated that it would need 90 days to double the capacity of its ordering interfaces. See Stacy La. OSS Aff., Exh. WNS-52, p. 116, Table 6-2. It is cold comfort to competing carriers that, if their orders are backlogged due to insufficient interface capacity, BellSouth can "readily increase" capacity in 90 days.

309. In addition to the lack of evidence that its interfaces have sufficient capacity to process orders electronically, Mr. Stacy provides no reliable source or basis for his demand forecasts. See Stacy OSS Aff., ¶ 191 & Exh. WNS-39. The various forecasts are based on 21 assumptions, which include predictions concerning the market share that the four largest interexchange carriers are expected to capture initially, the distribution of orders among the BellSouth interfaces, the growth of CLECs, the transfer of manual orders to LENS, and the distribution of pre-ordering functions to orders. Id., Exh. WNS-39, p. 13. Other than to state that some of the information underlying the assumptions came from Mr. Stacy, BellSouth provides no detail or documents to substantiate them. Moreover, some of the assumptions, such

as those concerning API and the number of pre-ordering transactions per order, are inconsistent with those of BellSouth and its witnesses.[130]

310. BellSouth further has not shown that, to the extent orders must be processed manually by BellSouth, BellSouth has devoted the personnel and resources to handle those orders in a timely, accurate, and reliable manner. Ms. Funderburg asserts that the BellSouth Local Carrier Service Centers "manually process an average of more than 3,000 Local Service Requests . . . per day," but then states (inconsistently) that the LCSCs processed 18,377 orders during the entire month of May. Funderburg Aff., ¶ 4. Regardless of which of her statistics is correct, she provides no figures on the actual capacity of the LCSCs to process orders. Although she contends that the LCSCs have "the capacity to process an additional weekly LSR volume of 10.9%," she never states what the existing underlying capacity is. Id. Moreover, even assuming that LCSCs are processing 3,000 orders per day, that volume is far lower than the claimed combined capacity of the electronic ordering interfaces.

311. More significantly, BellSouth appears to be receiving most of its orders manually. As I have previously described, previous BellSouth reports on flow-through capability showed that the majority of CLEC orders were submitted manually. BellSouth's own forecasts

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[130] For example, Mr. Stacy's forecasts assume that "TAGS" (which is API) will be offered for testing to three CLECs in November 1998, and will be publicly available in January 1999. Stacy OSS Aff., Exh. WNS-39, p. 13 (assumptions 6-7). However, he has consistently stated elsewhere that BellSouth will make API available for pre-ordering on August 30, 1998, and for ordering on November 1, 1998. Similarly, the forecast's assumed ratios of pre-ordering transactions to orders are dramatically different from those that BellSouth developed for purposes of the testing for Ernst & Young, which assumed a 4-to-1 ratio. Compare id. (assumption 18) with Putnam Aff., Exh. JWP-1, p. 11.

predict that the volume of CLEC manual orders will be 812,000 in 1998, 1.6 million in 1999, and 728,000 in 2000. The volumes of manually submitted orders that BellSouth forecasts for 1998 represent more than 50 percent of all CLEC orders. Stacy OSS Aff., Exh. WNS-39, p. 1. Given the absence of any reliable capacity data concerning the LCSC, it cannot be assumed that the LCSC has the capability to handle manual orders efficiently.

D. The Maintenance and Repair Interfaces

312. BellSouth's repair interfaces -- TAFI, T1M1 IXC, and ECTA -- also lack sufficient capacity to handle effectively and efficiently the combined operational requirements of all new entrants. In fact, BellSouth does not even discuss the capacity of the T1M1 IXC interface that BellSouth offers to CLECs.[131] Although Mr. Stacy claims that TAFI and ECTA have sufficient capacity, the facts do not support his assertion.

313. Mr. Stacy claims that TAFI currently has the capacity to support 150 simultaneous users, and 3,000 troubles per hour, throughout BellSouth's nine-state region. In addition, he states that this capacity can be increased "almost immediately" to a total of 300 users, or 6,000 troubles per hour. Stacy OSS Aff., ¶¶ 195, 215. The combined operational requirements for new entrants, however, may be even higher. Each new entrant needs to be able to have all of its repair attendants logged onto TAFI simultaneously, in order to provide timely service to their customers. Otherwise, a new entrant's repair attendant will have to log onto TAFI

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[131] See Stacy Aff., ¶¶ 172-174, 192, 195-196. Contrary to Mr. Stacy's assertion (Stacy OSS Aff., ¶ 200), the fact that the T1M1 IXC interface is currently used by interexchange carriers for access services does not mean that its capacity (like the capacity of EXACT) can be assumed to be adequate to handle the expected volumes of CLEC orders. See fn. 128, supra.

every time he receives a trouble report for a customer in BellSouth territory. New entrants, particularly larger national carriers, have large numbers of repair attendants who will be logged onto TAFI. Because of TAFI's inadequate capacity, new entrants will have to have at least some of their repair attendants log onto TAFI each time they receive a trouble report from a customer The time consumed in logging onto TAFI, and the distinct possibility that there will be no open "slots" when the representative attempts to log on, will prevent the provision of timely service [132]

314. By contrast, BellSouth's systems are not subject to these user limitations, because -- as Mr. Stacy admits -- BellSouth maintains a separate TAFI system for its own retail operations. Id., ¶ 160. This difference is clearly discriminatory.

315. Mr. Stacy's description of the capacity of the ECTA interface also does not support BellSouth's claims of sufficient capacity. Although he states that ECTA has a capacity of 200 troubles per day, or 6,000 troubles per month, he provides no support for this assertion. Stacy OSS Aff. ¶¶ 192, 196. Similarly, he provides no details or data in support of his bare assertion that BellSouth has tested ECTA. Id., ¶¶ 177, 208. Regardless of the extent to which BellSouth has tested ECTA, its stated capacity of only 200 troubles per day is inadequate to handle large volumes of transactions, and even to handle BellSouth's own forecasted volumes for

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[132] Although Mr. Stacy contends that BellSouth has conducted tests to ensure that TAFI can handle commercial volumes, he provides no details, results, or description of those tests. Stacy OSS Aff., ¶ 203. In any event, the volumes involved were only a fraction of TAFI's alleged capacity, and therefore provide no indication of the volumes that TAFI can actually handle. Id. The ability of TAFI to handle current volumes (which are low, due to the barriers to entry erected by BellSouth) is no indication of the current ability of TAFI to handle reasonably foreseeable demand volumes. See Ameritech Michigan Order, ¶ 138.

ECTA for 2000. Id., Exh. WNS-39, p. 11. This is particularly true if ECTA is again used by AT&T and if it is used by MCI, which was scheduled to implement ECTA in July. Id., ¶¶ 177, 217

E. The Billing Interfaces

316. BellSouth has offered no evidence to support Mr. Stacy's statement that its CLEC daily billable usage system has sufficient capacity to process daily usage files for CLECs. Id., ¶ 197. The only basis that Mr. Stacy offers for his position is the fact that BellSouth "has not identified any constraints to its capacity to process daily usage files for CLECs," and that its systems have "spare capacity." Id. BellSouth's ability to process current volumes, however, is no indication of its ability to handle the far greater volumes that can be expected in the future

F. BellSouth's Claims of Capacity Testing

317. Mr. Stacy's various claims that BellSouth has performed the necessary capacity testing on its various interfaces are without merit. See Stacy OSS Aff., ¶¶ 200-205 & Exh. WNS-40. The only "evidence" of testing that Mr. Stacy provides in support of his claim of capacity testing is a series of bar graphs that summarize the results of tests (apparently internal) conducted by BellSouth. Id., ¶ 202 & Exh. WNS-40. The charts are unaccompanied by any underlying data or documents, or even by a description of the methodology that was used (other than Mr. Stacy's assertion that the BellSouth testing plan incorporated the recommendations of IBM). See id., ¶ 201.[133] At best, they show that some kind of volume testing was performed on

[133] Although Mr. Stacy mentions that BellSouth engaged IBM to perform a preliminary review of (continued...)

three selected days, on two of which the testing was conducted for no more than four hours Id. Exh. WNS-40. They indicate that the testing did not even involve the entire ordering and provisioning process; the testing extended to the completion notification stage for no more than three hours, and (despite references to the number of "valid" service orders generated), Mr. Stacy's charts do not even suggest that the issuance of error and rejection notices was included in the process. Id. This is plainly insufficient to support BellSouth's claim of sufficient capacity testing.

318. Finally, Mr. Stacy's reliance on the "certification" of its volume testing by Ernst & Young and the testimony of Mr. Putnam is misplaced. Id., ¶ 205. The Ernst & Young "attestation," which is dated May 18, 1998, encompasses only one of the three tests that Mr. Stacy includes in his volume test results -- a test conducted on April 21, 1998. Stacy OSS Aff., Exh. WNS-40; Putnam Aff., Exh. JWP-1, p. 14. The "attestation" does not address the two other tests that BellSouth subsequently conducted on June 30 and July 6. Id.

319. In any event, the Ernst & Young "certification" is unreliable. First, Mr. Putnam did not attest to the reasonableness of BellSouth's projected capacity requirements [134]

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[133] (...continued)
its volume testing processes, his prior testimony made clear that those processes involved tests conducted in 1997, not the 1998 tests that are described in his exhibit. See Stacy OSS Aff., ¶ 201 & Exh. WNS-40; Stacy La. OSS Aff., ¶ 119. Moreover, Mr. Stacy does not enclose, much less reference, IBM's final review of the load demonstration results, which -- according to his previous Louisiana affidavit -- was "expected to be completed by mid-December 1997." Stacy La. OSS Aff., ¶ 119.

[134] Tenn. Tr., Vol. VI-A, p. 32 (testimony of John Putnam) (Attachment 47 hereto).

Evidence in the work papers of Ernst and Young indicate that BellSouth's proposed volumes were not reasonable. During the course of its engagement for BellSouth, Ernst & Young reviewed the adequacy of the May 1997 IBM report on BellSouth's volume testing process, which Mr. Stacy cites in his testimony.[135] Based on its review of the IBM report, Ernst & Young found that IBM had conducted an adequate review of the volume testing approach used to validate BellSouth's CLEC interfaces. However, contrary to the recommendation of the IBM report, BellSouth did not validate its assumption that 80 percent of all orders would be on EDI and 20 percent would be on LENS. To the contrary, BellSouth ignored the fact that based on BellSouth's historical experience, current volumes are 84 percent LENS orders and 16 percent EDI orders.[136] Significantly, Ernst & Young's work papers also indicated that LENS orders would exceed the tested capacity of 2,000 orders by April 1998.[137]

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[135] Stacy OSS Aff., ¶ 201; Tenn. Tr., Vol. VI-A, pp. 23-24 (testimony of John Putnam) (Attachment 47 hereto); "BellSouth ENCORE Test Assessment," report prepared by IBM Global Services, May 1997 ("IBM Report") (Attachment 49 hereto).

[136] Tenn. Tr., Vol VI-A, pp. 25-29 (testimony of John Putnam) (Attachment 47 hereto); IBM Report, p. 19 (Attachment 49 hereto); Ernst & Young workpaper, "BellSouth Access Certification Testing, October-November 1997" (Attachment 50 hereto); BellSouth response to Item No. 4 of AT&T's Second Document Requests in TRA Docket No. 97-00309, supra, "Narrative on Volume Testing" (Attachment 51 hereto)

[137] Tenn. Tr., Vol VI-A, pp. 27-28 (testimony of John Putnam) (Attachment 47 hereto); "Narrative on Volume Testing," supra (Attachment 51 hereto).

320. Second, Mr. Putnam did not attest to the reasonableness of BellSouth's testing methodology.[138] Instead, the Ernst & Young work papers indicate that BellSouth's testing methodology was not reasonable. Although the IBM report had recommended that BellSouth conduct a test at peak-hour volumes, BellSouth essentially ignored the recommendation; BellSouth tested peak loads for only three separate one-hour periods (during two of which periods it doubled only the load of EDI, without making a corresponding increase in LENS volumes), and when the completion module was not in operation. Moreover, BellSouth's own peak-hour projection for LENS ordering (328 orders per hour) was more than double the tested capacity of 150 orders per hour.[139] Similarly, although IBM recommended that BellSouth ensure that the capacity test provide coverage for representative access methods (such as dial-in and LAN-to-LAN), BellSouth's capacity test assumed that all LENS transactions would occur over a LAN-to-LAN connection -- despite historical experience indicating that most LENS transactions occur via dial-up or Internet

321. Indeed, the data on actual usage of BellSouth's interfaces belie the validity of Mr. Putnam's "attestation." As discussed above, the performance of BellSouth's interfaces demonstrates that BellSouth's OSS cannot handle even relatively small volumes without significant problems, including the lack of flow-through for more than two-thirds of orders

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[138] Tenn. Tr. Vol VI-A, p. 32 (testimony of John Putnam) (Attachment 47 hereto).

[139] Id., pp. 29-32 (Attachment 47 hereto); IBM Report, p. 18 (Attachment 49 hereto); Stacy OSS Aff., Exh. WNS-40, pp. 2-3; Ernst & Young workpaper, "LENS Volume Test Requirements" (Attachment 52 hereto)

submitted via EDI. BellSouth has provided no capacity test for its manual processes, despite the likelihood that it will continue to process substantial volumes of orders manually.

322. Finally, as previously stated, the tests covered by the Ernst & Young "certification" do not match those on which BellSouth relies here. The May 18 Ernst & Young certification does not include two later tests conducted by BellSouth on June 30 and July 6. Stacy OSS Aff., Exh. WNS-40, pp. 8-10b; Putnam Aff., Exh. JWP-1, p. 14. Given these omissions, Ernst & Young's "attestation" provides no support to BellSouth's claims.

CONCLUSION

323. The incremental "enhancements" made by BellSouth since its last Section 271 filing have not changed the basic fact: BellSouth's OSS do not provide parity of access to CLECs. In some respects, BellSouth's interfaces are inferior to those considered by the Commission in the South Carolina and Louisiana Section 271 proceedings. The numerous discriminatory aspects of the OSS substantially impair the ability of CLECs to compete, since they cannot conduct OSS functions with anything approaching the speed, reliability, and timeliness that BellSouth enjoys in its retail operations. As before, a significant amount of work remains to be completed before the BellSouth OSS can be deemed nondiscriminatory and operationally ready

AFFIDAVIT OF JAY M. BRADBURY
FCC DOCKET CC NO. 98-121

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on July 31, 1998.

Jay M. Bradbury

SUBSCRIBED AND SWORN TO BEFORE ME this 31st day of July, 1998.

Notary Public

My Commission Expires:

Notary Public Gwinnett County, Georgia
My Commission Expires March 14th, 1999

INDEX OF ATTACHMENTS TO AFFIDAVIT OF JAY BRADBURY IN CC Docket No. 98-121

Attachment	DESCRIPTION
1	"Operations Support Systems Issues" -- Table Summarizing Positions of BellSouth and AT&T regarding the Degree of BellSouth's Compliance with the Commission's Orders regarding BellSouth's Section 271 applications for South Carolina and Louisiana
2	Docket No. 8354-U, Investigation Into Development of Electronic Interfaces for BellSouth's Operations Support Systems (Georgia PSC), order issued June 4, 1998 ("Georgia OSS Order")
3	"Electronic Interface Change Control Process," document dated April 14, 1998
4	Electronic Interface Change Control Calendar
5	Notice and Agenda of the Enhancement Review Meeting scheduled for July 13, 1998, including change request log and change requests submitted for meeting
6	Customer Letter/Announcement from BellSouth to Competitive Local Exchange Carriers, dated April 10, 1998
7	BellSouth Web listing of On-Line CLEC Consumer Guides
8	Portions of BellSouth Kentucky SGAT, filed June 19, 1998
9	Letter from W. Scott Schaefer (BellSouth) to Melissa L. Closz (Sprint), et al., dated June 12, 1998
10	Letter from Bryan Green (MCI), et al. to Scott Schaefer (BellSouth), dated April 13, 1998
11	Bell Atlantic document, "Telecom Industry Services Change Management Process," dated May 22, 1998 (excerpts)
12	Minutes of the April 3, 1998 meeting and May 11, 1998 conference call of AT&T and BellSouth on directory listings ordering
13	Minutes of the April 16, 1998 meeting and May 12, 1998 conference call of AT&T and BellSouth on directory listings ordering
14	Letter from Steven M. Howard (AT&T) to Stephen Travers (BellSouth), dated April 8, 1998
15	Transcript of voice mail from Ray Crafton (AT&T) to Scott Schaefer (BellSouth), dated April 8, 1998

16	Electronic mail message from Gary Romanick (BellSouth) to Pamela Nelson (AT&T), dated July 17, 1998
17	Table describing inconsistencies between three BellSouth documents regarding ordering of combinations of UNEs (attached to e-mail message from James Hill (AT&T) to Valerie Gray (BellSouth), dated May 13, 1998
18	Letter from Jill Williamson (AT&T) to Valerie Gray (BellSouth), dated June 24, 1998
19	Letter from BellSouth Interconnection Services to All Competitive Local Exchange Carriers regarding ADL FID, dated July 7, 1998
20	Letter from Pamela Nelson (AT&T) to Jan Burriss (BellSouth), dated March 9, 1998
21	Letter from Jan Burriss (BellSouth) to Pamela Nelson (AT&T), dated March 20, 1998
22	AT&T/BST Directory Listings Ordering Issues Register
23	Letter from Philip H. Osman (AT&T) to W. Scott Schaefer (BellSouth), dated June 22, 1998
24	Depiction of contrast between the workaround approach agreed to between AT&T and BellSouth concerning orders for subsequent partial migrations submitted on the EDI-6 interface and the two-order approach suggested by BellSouth for such orders on the EDI-7 interface
25	Letter from Jan Burriss (BellSouth) to Pam Nelson (AT&T), dated June 15, 1998
26	Letter from W. Scott Schaefer (BellSouth) to Philip H. Osman (AT&T), dated June 15, 1998
27	Ordering and Billing Forum Issue No. 1471 regarding proposal to add TOS at line level (initial closure August 15, 1997, final closure November 7, 1997)
28	Letter from Denise Berger (AT&T) to Jan Burriss (BellSouth) dated June 19, 1998
29	Electronic mail message from Denise Berger (AT&T) to Paul Philpot (BellSouth), dated July 6, 1998
30	Letter from Pamela Nelson (AT&T) to Jerry Hendrix (BellSouth), dated June 11, 1997
31	Letter from Jerry Hendrix (BellSouth) to Pamela Nelson (AT&T), dated June 24, 1997
32	BellSouth Standard Interval Guide, Issue 1 (March 1998)

33	Comparison of standard intervals published by BellSouth in January 1998 with intervals published in March 1998, and intervals described by BellSouth in April 15, 1998 ex parte letter to the FCC
34	Copy of Local Service Itemization page in Customer Service Record available to BellSouth's retail operations
35	Copy of Billing Transfer Number page in Customer Service Record available to BellSouth's retail operations
36	Excerpts from Transcript of hearings in Docket No. 97-00309, In re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996 (Tenn. Regulatory Authority), Vols. III-E and IV-E (testimony of William Stacy)
37	Description of LENS' inability to provide non-discriminatory access as an interface for ordering and provisioning
37a	Comparison of on-line, front-end edits available in LENS with those available in BellSouth's retail interfaces
38	Deposition of William N. Stacy taken August 14, 1997, in Docket No. 960786-TL (Fla. PSC) (excerpts)
39	Letter from Pamela Nelson (AT&T) to Jan Burriss (BellSouth), dated April 9, 1998
40	"BellSouth Telecommunications, Inc. Electronic Services Project: Software Process Evaluation Report," Bellcore Special Report SR-4567, Issue 1 (March 1998)
41	Pre-Ordering Response Times on EC-Lite Interface (table)
42	Table showing monthly volumes of "CLEC errors" and BellSouth errors, as reported in BellSouth's flow-through reports, December 1997-May 1998
43	Flow-through reports for December 1997, January 1998, and February 1998 submitted by BellSouth in state regulatory proceedings
44	BellSouth Local Services Mechanized Billing: table describing errors and imbalances in billing from BellSouth, for both resale and UNEs
45	Letter from James Hill (AT&T) to Foster Haley (BellSouth), dated May 15, 1998
46	Monthly analysis by AT&T of inaccuracies in BellSouth's bills for UNE combinations from May 20, 1997 to May 20, 1998

47	Excerpts from Transcript of hearings in TRA Docket No. 97-00309, supra, Vol. VI-A (testimony of John Putnam)
48	Exhibit WNS-43 to Affidavit of William N. Stacy on Operations Support Systems submitted as part of BellSouth's Section 271 application in CC Docket No. 97-231, describing capacities of EDI and LENS interfaces
49	"BellSouth ENCORE Test Assessment," report prepared by IBM Global Services, May 1997
50	Ernst & Young workpaper, "BellSouth Access Certification Testing, October-November 1997"
51	BellSouth response to Item No. 4 of AT&T's Second Document Requests in TRA Docket No. 97-00309, supra, "Narrative on Volume Testing"
52	Ernst & Young workpaper, "LENS Volume Test Requirements"